

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DISTRICT**

NORMA PANTOJA, and)	
JANETH ADRIANA BARRAGAN CRUZ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:17-cv-0675
)	
JEAN PEREZ, JESUS ENRIQUE)	District Judge Crenshaw
BOLAÑOS RANGEL, EMILIO ESTEFFAN)	Magistrate Judge Holmes
RODRIGUEZ, GESTORIA BOLAÑOS &)	
ASOCIADOS, GRUPO ADUANAL)	
LATINO, LLC,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT

The Plaintiffs, through undersigned counsel, respectfully file this Motion for Default Judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure.

In its January 19, 2018 Order, the Court instructed the Defendant to either obtain counsel to enter a notice of appearance or notify the Court of her intention to proceed pro se by no later than January 31, 2018. (Doc. #23 at 2.) The Court warned that the Defendant's failure to comply with this requirement would result in a recommendation by the Court for an entry of default judgment against the Defendant. (*Id.*) The Defendant has failed to comply with the Court's Order. The Plaintiffs therefore respectfully request that the Court enter a default judgment against the Defendant for the amount stipulated in the Complaint (Doc. #1) and in the Plaintiff's Proposed Initial Case Management Order (Doc. #21) of \$289,517.25 plus interest, reasonable attorney's fees, and any measures the Court considers just and equitable for the Plaintiff Norma Pantoja and \$286,760.00 plus interest, reasonable attorney's fees, and any measures the Court considers just and equitable for the Plaintiff Janeth Adriana Barragan Cruz.

Dated: February 6, 2018

Respectfully submitted,

/S/ Joel Sanderson

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Certificate of Service

I hereby certify that on this date I served upon the Defendant a true and accurate copy of the foregoing *Motion for Default Judgment*, and all attachments thereto, via U.S. mail, postage prepaid:

Dated: February 6, 2018

/s Joel Sanderson